DATE: September 27th, 2013

TO: **Gary Miller, Remedial Project Manager, U S Environmental Protection Agency Region 6 Dallas, Texas**

Stephen Tzhone, Remedial Project Manager, U S Environmental Protection Agency Region 6 Dallas, Texas

FROM: **Kent Becher, U S Geological Survey Technical Liaison (Hydrologist) to U S Environmental Protection Agency Region 6 Superfund Division, Fort Worth and Dallas, Texas**

SUBJECT: **Review of Draft Feasibility Study Report, San Jacinto River Waste Pits Superfund Site, August 2013**

Gary,

I have completed a review of the "Draft Feasibility Study Report, Jacinto River Waste Pits Superfund Site, August 2013 "and I have attached comments below.

If you have any questions or concerns, please contact me at (817) 253-0356 or by e-mail at kdbecher@usgs.gov.

Sincerely,

Kent D. Becher

Kent Becher

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Comments

1. **Page ES-1, second paragraph, last sentence (minor editorial comment)**: Reference includes acronym RACR, first use in document, please define here.

2. **Page ES-3, second paragraph, third sentence:** "*an outcome that has been documented at other sediment remediation projects in spite of significant efforts made to prevent or control such releases.*" Please add at least one reference to a site where these problems have been documented.

3. **Page 4, first paragraph, second sentence (minor editorial comment):** Change figure referenced to figure 1-2 since this figure shows impoundments, I-10, and EPA preliminary site perimeter.

4. **Page 5, first paragraph, second sentence:** Please provide reference to the historical document mentioned in this sentence.

5. **Page 6, second paragraph last sentence:** Please either modify figure 1-2 to show location of TCRA or include figure 1-1 with figure 1-2 in sentence.

6. **Page 7, second paragraph, second sentence (minor editorial comment):** Please add an "a" to Integral 2012 reference.

7. **Page 9, second bullet:** Please include subsidence may submerge land that was not previously submerged.

8. **Page 11, first paragraph:** Please include some general statements about the number of surficial sediment samples that exceeded the REV. In addition, the same comment in regards to concentrations with depth (Figure 2-4).

9. **Page 22, last paragraph, figure 3-1**: Figure 3-1 legend shows a purple dot for exceedences of greater than 220, but there are no purple dots on map. Suggest removing the greater than purple dot from legend which helps emphasize there are no locations in the shallow sediment that exceed 220.

10. **Page 23, second complete paragraph:** The reviewer is confused by this paragraph. The prior paragraph states a PCL of 1,300 for soil/sediment (outdoor commercial worker) and there were quite a few locations that exceeded the PCL. This paragraph is for soil (recreational visitor) and it has the same PCL of 1,300, but it states soils don't exceed the PCL in any locations outside of the TCRA footprint. Please add figure to show that to be the case or please include more text to paragraph to clarify the difference between these two scenarios.

11. **Table 3-1:** Please add BCT, BAT, POTW, TCMP, TMDL, MCL, CMP, RCRA, NFIP, TCCC, MOU, T&E, CRNA, and CZMP (define in text) to acronym list at

the beginning of report. References in table are listed at the end of table, but you might want to consider adding them to the main reference page.

12. **Page 31, section 3.3.15, first paragraph, first sentence:** Please add TPWD 2008 to reference list.

13. **Page 36, Section 4.1, second paragraph:** Please add Figure 3-2 as reference somewhere in the last couple of sentences.

14. **Page 36, last full paragraph, last sentence:** Please add Figure 3-3 to end of sentence.

15. **Page 36, last sentence:** *"The highest $TEQ_{DF,M}$ concentration observed in subsurface soil is 303 ng/kg."* Please indicate the location of this sample. Reviewer couldn't verify it by looking at the maps provided in the report.

16. **Page 50, second paragraph, first sentence:** This sentence is confusing since it refers to Figure 2-3, but there are no sample IDs for SJB023 and SJB025on the map. In addition, the reviewer couldn't locate a 59.3 ng/kg location in the area south of I-10 on figure. In addition, these figures show REVs at the bottom of the figure instead of PQL's. Suggest referring to one of Figure 3- series. Please revise, so a reader can read the sentence and find the appropriate information on the map that is referenced.

17. **Page 52, first paragraph:** The model predicts that additional sediment will be transported to this area, thus further inhibiting potential for contamination to reach receptors. However, there is the potential for the opposite effect if a large event actually erodes sediment. The monitor natural recovery plan should include methods to determine if there has been erosion or deposition in the area.

18. **Page 69 first complete sentence:** Please include figure reference so the location of SJNE032 can be located by a reader of the document.

19. **Figure 6-1B:** An inset figure or a new figure needs to be added here to show locations of river miles.

20. **Appendix A, page 3, Section 1.2.1, last paragraph, first sentence (minor editorial comment):** Please add label for the HSC on figure 1-1.

21. **Appendix A, Figure 2-1:** There appears to be little change in WSE at the lower boundary during large flood events. Please clarify what this figure is indicating. The WSE part of the figure should show variations in WSE for 2, 10, and 100 year events.

22. **Appendix A, page 22, second paragraph (minor editorial comment**): Please add reference to figures 2-4 and 2-5 within this paragraph.

23. **Appendix A, figures 3-15 and 3-16**: Please explain why there is a dramatic change in flow variability from Lake Houston starting at year 7. Overall, the figures are very busy and tightly constrained. Suggest orienting figures in landscape to spread out the data.

24. **Appendix A figure 4-3:** Please see comment 23.

25. **Appendix A, page 44 (minor editorial comment):** Please remove Integral and Anchor 2012 reference since it is not cited anywhere in Appendix A.

26. **Appendix B, figure 1 (editorial comment):** Figure needs to include information source such as airport, date range and so forth.

27. **Appendix B, first paragraph, last sentence:** The computed wave height for the max wind speed (53 mph, 1.43 ft) is lower than 100-year (48.2 mph and 1.63). Please clarify in the text why the higher wind speed wave height is lower.